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OSBORN LAW P.C.

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Lindsay M. Trust, Esq.

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Date filed: 5/17/2023

May 16, 2023

APPLICATION GRANTED

Hon, Katharine H. Parker, U.S.M.J. 5/17/2023

## **VIA ECF**

Honorable Katherine H. Parker United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: McNair v. Commissioner of Social Security

Civil Action No. 1:23-cv-01290-KHP

Dear Judge Parker,

We write on behalf of our client, Sean McNair, to request additional time to file his motion for judgment on the pleadings which is currently due on May 18, 2023 per the Court's February 16, 2023 Standing Scheduling Order. This is the plaintiff's first request for an extension.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file his motion for judgment on the pleadings on or before: July 17,
   2023;
- Defendant to file its response to plaintiff's motion/cross motion on or before:
   October 15, 2023; and
- Plaintiff to file his reply, if any, on or before: October 30, 2023.

Honorable Katherine H. Parker May 16, 2023 Page Two

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Heetano Shamsoondar, Esq. (by ECF)